

LAW OFFICES OF DALE K. GALIPO

Dale K. Galipo (SBN 144074)
dalekgalipo@yahoo.com
Cooper Alison-Mayne (SBN 343169)
cmayne@galipolaw.com
21800 Burbank Boulevard, Suite 310
Woodland Hills, CA 91367
Phone: (818) 347-3333

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT FOR THE
CENTRAL DISTRICT OF CALIFORNIA**

SANDRA KIRKMAN, CARLOS
ALANIZ, individually and successors-in-
interest to JOHN ALANIZ, deceased,

Plaintiff,

vs.

STATE OF CALIFORNIA, RAMON
SILVA, and DOES 1-10, inclusive,

Defendants.

Case No. 2:23-cv-07532-DMG-SSC
[Hon. Dolly M. Gee]

**PLAINTIFFS' PROPOSED VOIR
DIRE QUESTIONS**

Pre-Trial Conference
March 25, 2025, 10:00 a.m.

Trial
April 15, 2025, 8:30 a.m.

PLEASE TAKE NOTICE that the Plaintiffs hereby submit their proposed voir dire questions for the Court's consideration.

Respectfully submitted,

DATED: March 14, 2025

LAW OFFICES OF DALE K. GALIPO

By: /s/ Cooper Alison-Mayne
Dale K. Galipo, Esq.
Cooper Alison-Mayne
Attorneys for Plaintiffs

PLAINTIFFS' PROPOSED VOIR DIRE QUESTIONS

Questions re: Police Officer Bias

1. Would you be more likely to believe the testimony of a police officer over the testimony of somebody who is not a police officer?
2. Do you think a police officer who is a defendant in a civil case is capable of testifying falsely under oath?
3. Do you think that a police officer is capable of testifying falsely under oath to support a fellow officer?
4. Are you or any of your family members or close friends current or former government employees, police officers, or sheriff's deputies?
 - a. If yes, what agency and what type of job?
5. Are you or any of your family members or close friends current or former service members in any division or branch of our military? If yes, what division or branch and what type of job?
6. Are you or is anyone you know a current or former police officer or sheriff's deputy? If yes, who, what agency do (or did) they work for, and for how long?
7. Have you or has anyone you know attended or applied to attend any law enforcement academy or basic training?
8. Have you applied to or are you a member of any branch of the armed forces?
9. Have you or anyone you know worked as or applied to work as a firefighter, paramedic, or other type of emergency response personnel?
10. Does anyone feel that police officers or sheriff's deputies have been unfairly portrayed in the media with respect to the use of force?

Questions re: Juror Connection to Defendants

11. Have you, a family member, or any of your close friends had any contact or association with the California Highway Patrol, or any of their employees? If so, please describe the circumstances of the contact or association.

a) If so, would you view the evidence in this case differently because of your past experience with the California Highway Patrol, or any of their employees?

12. Are you or is anyone you know a current or former employee of the California Highway Patrol? If so:

a. Who do you know?

b. What is or was their job?

c. How long were they employed?

d. Would you view the evidence in this case differently because of your relationship with that person (or those people)?

13. Are you or is anyone you know a current or former employee of the State of California or any of its agencies? If so:

a. Who do you know?

b. What is or was their job?

c. How long were they employed?

d. Would you view the evidence in this case differently because of your relationship with that person (or those people)?

Questions re: Justiciability of Police Officer Conduct

14. Do you think that our society should hold police officers liable in court when they violate an individual's constitutional rights?

15. Do you agree that police officers or the entity they work for should pay money damages when they violate an individual's constitutional rights?

16. Do you think that police officers should be able to use as much force as they want when arresting someone?

1 17.Do you think that our society should restrict the amount of force that police officers
2 can use?

3 **Questions re: General Juror Bias & Bias Against Actions for Money Damages**

4 18.Do you think that because the defendants are denying responsibility for this
5 incident, they are probably not responsible?

6 19.Is there anybody that would hold it against the plaintiffs simply because they have
7 pursued this case to trial?
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28